

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

Keymo E. Johnson,
Plaintiff,
vs.
Progressive Insurance Company,
Defendant,
(Enter above the full name of the
Defendant(s) in this action.)

FILED

04/30/2021

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

Case No.: 2:21-cv-00199-JRS-DLP
(TO BE SUPPLIED BY THE CLERK)

SCANNED at WVCF and Emailed on
4/30/21 by HM 13 pages.
(date) (initials) (num)

COMPLAINT

I. PARTIES

The names and addresses of each plaintiff and defendant are as follows:

A. Plaintiff:

Name Keymo E. Johnson
Identification Number 113026
Address P.O. Box 1111
Carlisle, IN 47838

B. Defendant(s)

Name Progressive Insurance Company
Title Insurance Company
Address 221 Florence Ave Suite H6
Granger, IN 46530

Name _____
Title _____
Address _____

Name _____

Title _____

Address _____

(Identify additional plaintiffs and defendants on a separate sheet of paper using this same outline)

II. STATEMENT OF JURISDICTION AND PREVIOUS LAWSUITS:

Jurisdiction over this action exists in the United States District Court for the Southern District of Indiana because I'm incarcerated,

If the same facts alleged or claims made in this suit have been previously presented to any other state or federal court in an earlier suit, for each such earlier suit identify the parties, the Court in which it was filed, the docket number assigned to the suit, the status of such earlier suit, (for example: pending, dismissed, set for trial, on appeal, etc.). and the nature of the disposition if the earlier case is closed.

IV. CAUSE OF ACTION

State which of your constitutional or federal rights, privileges or immunities have been violated and summarize in one or two sentences what the defendant(s) did to violate your rights in that regard. If you are claiming that more than one of your constitutional rights were violated, use a separate paragraph (ground) for each right, privilege or immunity which was violated. If you have more than three (3) grounds, identify them in a separate attached piece of paper.

Ground 1: My 8 Amendment was violated by cruel and unusual punishment.

Ground 2: Also my 14 Amendment was violated due to being deprived of my basic rights.

Ground 3: _____

(Identify additional grounds on a separate sheet of paper)

V. STATEMENT OF FACTS

State here the FACTS of your case. You should outline both the facts on which your suit is based and the particular role of each defendant in those circumstances.

I was denied the right to fair and just medical treatment. I was injured in a car wreck that is insured by Progressive Insurance Company. I am going to need long term treatment or have surgery to fix the disc in my neck.

I can no longer work certain job; I can't lift heavy objects continuously. I also have moments were my arms go numb and sometimes when it feels like they are on fire also, I've been to the Neurologist two(2) times and had other appointments to get X-rays plus a MRI.

VI. RELIEF

State exactly what relief or action you are requesting through this lawsuit.

I will need funds if I'm going to need surgery and if I'm not able to take jobs that require heavy lifting, I been plagued with a great deal of pain and suffering. I would like to be compensated for my pain and suffering. I would like 250,000.⁰⁰ two hundred fifty Thousand dollars.

AFFIRMATION OF PLAINTIFF

I, the plaintiff in the aforementioned cause, do affirm that I have read all of the statements contained in this complaint and that I believe them to be true and correct to the best of my personal knowledge and belief.

Signed this 28 day of April, 2021.

Keymojohnson
Plaintiff